

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	<b>:</b>	<b>CHAPTER 13 PROCEEDING</b>
	<b>:</b>	
<b>GLEND A L. CHAMBERLIN</b>	<b>:</b>	<b>CASE NO. 16-10334-TPA</b>
	<b>:</b>	
<b>Debtor.</b>	<b>:</b>	
	<b>:</b>	
<b>M&amp;T BANK,</b>	<b>:</b>	
<b>Movant,</b>	<b>:</b>	
	<b>:</b>	
<b>vs.</b>	<b>:</b>	
	<b>:</b>	
<b>GLEND A L. CHAMBERLIN</b>	<b>:</b>	
<b>RONDA WINNECOUR,</b>	<b>:</b>	
<b>Trustee,</b>	<b>:</b>	
<b>Respondent(s).</b>	<b>:</b>	

**OBJECTION TO FINAL CONFIRMATION OF CHAPTER 13 PLAN**

AND NOW, comes secured creditor, M&T Bank (“Movant”), by and through its counsel, Alicia M. Sandoval, Esquire, and hereby files the following objection to final confirmation of the Debtor’s Chapter 13 Plan:

1. On or about May 4, 2016, the Debtor filed a Chapter 13 Plan with the Court.
2. On September 19, 2016, Movant filed secured claim no. 4 with a total secured claim in the amount of \$24,207.53 and pre-petition arrears in the amount of \$549.45. Movant’s claim is secured only by a security interest in the Debtor’s real property located at 123 Alpine Road, St. Mary’s, PA 15857. A copy of Proof of Claim no. 4 is attached hereto as Exhibit “A.”
3. The secured property is the Debtor’s personal residence.
4. The Debtor’s Chapter 13 Plan, confirmed on an interim basis on August 23, 2016, has no provisions regarding Movant’s claim.
5. The Chapter 13 Plan is an attempt to modify the rights of the secured creditor in violation of Section 1322(b)(2).

6. M&T Bank respectfully requests that the Court deny final confirmation of the Debtor's Chapter 13 Plan unless the Debtor amends her Plan to satisfy the arrears and provide for adequate treatment of Movant's secured claim.

Respectfully submitted,

Dated: October 24, 2016

/s/ Alicia M. Sandoval  
Alicia M. Sandoval, Esquire  
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